



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

217/524-3300

## CERTIFIED MAIL

APR 16 2014

7012 0470 0001 3001 2088

Wedron Silica Company  
Attn: Mike Melton  
3450 East 2056<sup>th</sup> Road  
Wedron, IL 60557

Re: LPC #0998290002 – La Salle County  
Wedron/Wedron Silica Company  
3450 East 2056<sup>th</sup> Road  
Leaking UST Incident No. 20140173  
Leaking UST Technical File

Dear Mr. Melton:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the Stage 2 Site Investigation Plan (plan) submitted for the above-referenced incident. This plan, dated March 18, 2014, was received by the Illinois EPA on March 20, 2014. Citations in this letter are from the Environmental Protection Act (Act), as amended by Public Act 92-0554 on June 24, 2002, and Public Act 96-0908 on June 8, 2010, and 35 Illinois Administrative Code (35 Ill. Adm. Code).

The Illinois EPA requires modification of the plan; therefore, the plan is conditionally approved with the Illinois EPA's modifications. The Illinois EPA has determined that the modifications listed in Attachment A are necessary to demonstrate compliance with Title XVI of the Act and 35 Ill. Adm. Code 734 (Sections 57.7(a)(1) and 57.7(c) of the Act and 35 Ill. Adm. Code 734.505(b) and 734.510(a)).

NOTE: The plan proposes activities that are technically acceptable as modified in this letter. However, this letter does not constitute Illinois EPA approval of any costs incurred during the completion of such activities. For the purpose of payment from the Fund, some of the activities are in excess of those necessary to meet the minimum requirements of the Act and regulations. Owners and operators are advised that they may not be entitled to full payment or reimbursement for this reason. The Illinois EPA will review your complete request for partial or final payment from the Underground Storage Tank Fund after it is submitted to the Illinois EPA.

**Further, pursuant to 35 Ill. Adm. Code 734.145, it is required that the Illinois EPA be notified of field activities prior to the date the field activities take place. This notice must include a description of the field activities to be conducted; the name of the person conducting the activities; and the date, time, and place the activities will be conducted. This notification of field activities may be done by telephone, facsimile, or electronic mail—and must be provided at least three (3) working days prior to the scheduled field activities.**

Pursuant to Sections 57.7(a)(5) and 57.12(c) and (d) of the Act and 35 Ill. Adm. Code 734.100 and 734.125, the Illinois EPA requires submittal of a Stage 3 Site Investigation Plan, and budget if applicable, or Site Investigation Completion Report within 30 days after completing the site investigation to:


Illinois Environmental Protection Agency  
Bureau of Land - #24  
Leaking Underground Storage Tank Section  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, IL 62794-9276

Please submit all correspondence in duplicate and include the Re: block shown at the beginning of this letter.

An underground storage tank system owner or operator may appeal this decision to the Illinois Pollution Control Board. Appeal rights are attached.

If you have any questions or need further assistance, please contact Jason Donnelly at (217) 557-8764.

Sincerely,

A handwritten signature in black ink, appearing to read "Harry A. Chappel", with a stylized flourish at the end.

Harry A. Chappel, P.E.  
Unit Manager  
Leaking Underground Storage Tank Section  
Division of Remediation Management  
Bureau of Land

hac:jmd:jab\140173-stage2.sip.dotx

Attachments: A  
Appeal Rights

c: GZA GeoEnvironmental, Inc., Bernard Felelon  
BOL File

## Attachment A

Re: LPC #0998290002 – La Salle County  
Wedron/Wedron Silica Company  
3450 East 2056<sup>th</sup> Road  
Leaking UST Incident No. 20140173  
Leaking UST Technical File

Citations in this attachment are from the Environmental Protection Act (Act) as amended by Public Act 92-0554 on June 24, 2002, and Public Act 96-0908 on June 8, 2010, and 35 Illinois Administrative Code (35 Ill. Adm. Code).

1. The Stage 1 site investigation must be designed to gather initial information regarding the extent of on-site soil and groundwater contamination that, as a result of the release, exceeds the most stringent Tier 1 remediation objectives of 35 Ill. Adm. Code 742 for the applicable indicator contaminants. The Stage 1 site investigation must consist of a soil investigation; a groundwater investigation, if required; and an initial water supply well survey.

(Section 57.1(a) of the Act and 35 Ill. Adm. Code 734.315)

### Soil investigation:

- a. Up to four borings must be drilled around each independent UST field where one or more UST excavation samples collected pursuant to 35 Ill. Adm. Code 734.210(h), excluding backfill samples, exceed the most stringent Tier 1 remediation objectives of 35 Ill. Adm. Code 742 for the applicable indicator contaminants. One additional boring must be drilled as close as practicable to each UST field if a groundwater investigation is not required. The borings must be advanced through the entire vertical extent of contamination, based upon field observations and field screening for organic vapors, provided that borings must be drilled below the groundwater table only if site-specific conditions warrant.
- b. Up to two borings must be drilled around each UST piping run where one or more piping run samples collected pursuant to 35 Ill. Adm. Code 734.210(h) exceed the most stringent Tier 1 remediation objectives of 35 Ill. Adm. Code 742 for the applicable indicator contaminants. One additional boring must be drilled as close as practicable to each UST piping run if a groundwater investigation is not required. The borings must be advanced through the entire vertical extent of contamination, based upon field observations and field screening for organic vapors, provided that borings must be drilled below the groundwater table only if site-specific conditions warrant.

- c. One soil sample must be collected from each five-foot interval of each boring drilled pursuant to 35 Ill. Adm. Code 734.315(a)(1)(A) and (B). Each sample must be collected from the location within the five-foot interval that is the most contaminated as a result of the release. If an area of contamination cannot be identified within a five-foot interval, the sample must be collected from the center of the five-foot interval. All samples must be analyzed for the applicable indicator contaminants.

The vertical extent of soil contamination has not been defined at boring locations WS-SB-GP-3 through WS-SB-GP-6. While proposed soil boring GP-1-2014 is sufficient to try and determine the vertical extent at former boring WS-SB-GP-4, three additional soil borings must be advanced to determine the vertical extent at former soil boring locations WS-SB-GP-3, WS-SB-GP-4 and WS-SB-GP-5. If groundwater is encountered while drilling, a groundwater investigation pursuant to 35 IAC 734.315(2) would also be required.

2. For purposes of 35 Ill. Adm. Code 734, for gasoline (including but not limited to leaded, unleaded, premium, and gasohol) the indicator contaminants must be benzene, ethylbenzene, toluene, total xylenes, and methyl tertiary butyl ether (MTBE), except as provided in 35 Ill. Adm. Code 734.405(h). For leaded gasoline, lead must also be an indicator contaminant. (Section 57.1(a) of the Act and 35 Ill. Adm. Code 734.405(b))

Soil samples collected from soil borings WS-SB-GP-3 through WS-SB-GP-6 were analyzed for m,p-xylene and o-xylene instead of Total xylenes, which is not acceptable. Therefore, sample locations WS-SB-GP-3 through WS-SB-GP-6 must be re-sampled and analyzed for Total xylenes as required above.

3. In addition, based on the actual laboratory results, the analytical results presented in Table 1 are not correct. The concentrations in Table 1 are provided in ug/kg and should be in mg/kg; and therefore, the table must be revised.
4. At a minimum, the owner or operator must conduct a water supply well survey to identify all potable water supply wells located at the site or within 200 feet of the site, all community water supply wells located at the site or within 2,500 feet of the site, and all regulated recharge areas and wellhead protection areas in which the site is located. Actions taken to identify the wells must include, but not be limited to, the following:
  - a. Contacting the Illinois EPA's Division of Public Water Supplies to identify community water supply wells, regulated recharge areas, and wellhead protection areas;

- b. Using current information from the Illinois State Geological Survey, the Illinois State Water Survey, and the Illinois Department of Public Health (or the county or local health department delegated by the Illinois Department of Public Health to permit potable water supply wells) to identify potable water supply wells other than community water supply wells; and
- c. Contacting the local public water supply entities to identify properties that receive potable water from a public water supply.

(Section 57.1(a) of the Act and 35 Ill. Adm. Code 734.445(a))

A water well survey meeting the above criteria must be provided for review.

- 5. The Chain of Custody Report indicates several additional samples were submitted to the laboratory for analysis. Therefore, the sample locations and analytical results for GP-1, GP-2 and GP-7 through GP-14 must be submitted for review.

jmd:jab\140173-stage2.A.dotx

## Appeal Rights

An underground storage tank owner or operator may appeal this final decision to the Illinois Pollution Control Board pursuant to Sections 40 and 57.7(c)(4) of the Act by filing a petition for a hearing within 35 days after the date of issuance of the final decision. However, the 35-day period may be extended for a period of time not to exceed 90 days by written notice from the owner or operator and the Illinois EPA within the initial 35-day appeal period. If the owner or operator wishes to receive a 90-day extension, a written request that includes a statement of the date the final decision was received, along with a copy of this decision, must be sent to the Illinois EPA as soon as possible.

For information regarding the filing of an appeal, please contact:

Dorothy Gunn, Clerk  
Illinois Pollution Control Board  
State of Illinois Center  
100 West Randolph, Suite 11-500  
Chicago, IL 60601  
312/814-3620

For information regarding the filing of an extension, please contact:

Illinois Environmental Protection Agency  
Division of Legal Counsel  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, IL 62794-9276  
217/782-5544